

Rodolfo Camacho, OSB 95520
Bankruptcy Trustee
PO Box 13897
Salem Oregon 97309
Tel: (503) 244-4810

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re)	Case No. 18-32288-pcmtmb7
)	
THREE J'S DISTRIBUTING, INC.)	MOTION TO ALLOW TRUSTEE TO PAY
)	KELLY EDWARDS FOR ASSISTING THE
Debtor.)	ESTATE IN SAIF AUDIT; THEREBY,
)	ALLOWING A POTENTIAL REFUND TO THE
)	ESTATE

COMES NOW Rodolfo A. Camacho, the Chapter 7 Trustee herein, and respectfully
moves this Court for an order, allowing the estate to employ and pay Kelly Edwards, for her
assistance to the estate follows:

1) The estate has been advised by SAIF (Oregon's Workers Compensation
Insurance), that approximately \$15,000.00 may potentially be refundable to the estate, after the
completion of a final audit;

2) While employed by Debtor, Kelly Edwards assisted Debtor in their audits
performed by SAIF (Oregon's Workers Compensation Insurance), and is currently the only
known individual, whom has the inside knowledge of Debtor's records, required to assist in the
audit;

/////

/////

/////

1 - Motion To Allow Trustee To Pay Kelly Edwards
For Assisting the Estate With A SAIF Audit

Rodolfo A. Camacho
Trustee
PO Box 13897
Salem, Oregon 97309
(503) 244-4810

3) Kelly Edwards is seeking a flat fee of \$1,200.00 for her assistance in completing the audit with SAIF (Oregon's Workers Compensation Insurance), on the estate's behalf.

DATED this 27th day of December, 2018.

/s/ Rodolfo A. Camacho
Rodolfo A. Camacho, Trustee